

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TREASURE CHEST THEMED VALUE MAIL,  
INC.,

Plaintiff,

-against-

DAVID MORRIS INTERNATIONAL, INC.,

Defendant.

Civil Action No.

1:17-cv-0001-NRB

**DECLARATION IN SUPPORT  
OF PLAINTIFF'S MOTION  
TO REGISTER JUDGMENT  
IN OTHER DISTRICTS**

**DANIEL KNOX**, an attorney duly admitted to practice in the Southern District of New York, affirms the following under the penalties of perjury.

1. I am the principal attorney of Knox Law Group, P.C., counsel for the plaintiffs in this action.
2. I make this declaration in support of Plaintiff's motion for an order directing the registration of the judgment in this case in the following districts: Washington State, Florida, and Texas.
3. After a trial of the issues in this case, a judgment was entered in favor of the plaintiff for \$105,225.72 on June 28, 2018 (Docket No. 49).
4. Defendant has filed an appeal but has not posted a bond to secure damages provided for in the Judgment pending appeal.
5. I have conducted a post-judgment investigation into Defendant's assets and have been unable to locate any assets belonging to Defendant in New York.

6. Defendant represents on its website that its principal offices are located at 2512 State Street, Dallas, Texas.<sup>1</sup>
7. Upon information and belief, Defendant has assets in Texas that are available to contribute to the satisfaction of the Judgment.
8. Defendant also maintains an active registration with the Florida Secretary of State entitling it to conduct business in Florida.
9. On its website, Defendant also lists the names of several entities representing that each is a client of Defendant, including Paul Gauguin Cruises, Orion Expedition Cruises, Windstar Cruises and MSC Yacht Club.<sup>2</sup> (collectively, the “Clients”).
10. The principal offices of Paul Gauguin Cruises and Windstar Cruises are located in Washington State.
11. Upon information and belief, MSC Yacht Club is a luxury program of MSC Cruises (USA) Inc., a Florida corporation.
12. As clients of Defendant, it is reasonable to presume that the Clients are in possession of Defendant’s assets in the form of accounts payable to Defendant.
13. Defendant also has a business relationship with, and receives revenue from, Auto Europe, LLC, a Delaware limited liability company.
14. Defendant receives revenue from Auto Europe, LLC.
15. Upon information and belief, Defendant has assets in Washington that are available to contribute to the satisfaction of the Judgment.
16. Upon information and belief, Defendant has assets in Florida that are available to contribute to the satisfaction of the Judgment.

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<sup>1</sup> <http://www.davidmorrisintl.com> (last accessed January 14, 2019)

<sup>2</sup> <http://www.davidmorrisintl.com/clients.html> (last accessed January 14, 2019)

17. Upon information and belief, Defendant has assets in Delaware that are available to contribute to the satisfaction of the Judgment.

Dated: New York, NY  
January 14, 2019

\_\_\_\_\_/s/  
Daniel Knox